Date Out: 3/4/96

Chemical Code:108801
Barcode:D222989

ENVIRONMENTAL FATE AND GROUND WATER BRANCH

Review Action

To: Walter Waldrop, PM # 71
Special Review and Reregistration Division (7508W)

From: Elizabeth Behl, Section Head
Ground Water Technology Section
Environmental Fate & Ground Water Branch/EFED (7507C)

EBehl

Thru: Henry Jacoby, Chief
Environmental Fate & Ground Water Branch/EFED (7507C)

Henry Jacoby 3/12/96

Attached, please find the EFGWB review of...

Common Name:	Metolachlor	Trade name:	Dual, Medal
Company Name:	CIBA-GEIGY Corporation		
ID #:			
Purpose:	Review of CIBA's comments on the Draft RED for Metolachlor		

Type Product:	Action Code:	EFGWB #(s):	Review Time:
Herbicide	001		0.5 day

STATUS OF STUDIES IN THIS PACKAGE:

Guideline	MRID	Status[1]

STATUS OF DATA REQUIREMENTS ADDRESSED IN THIS PACKAGE:

Guideline	Status[2]
166-1	S

[1]Study Status Codes: A = Acceptable U = Upgradeable C = Ancillary I = Invalid.
[2]Data Requirement Status Codes: S = Satisfied P = Partially satisfied N = Not satisfied R = Reserved W = Waived.

DP BARCODE: D222989 REREG CASE # 0001

CASE: 819424 DATA PACKAGE RECORD DATE: 03/08/96
SUBMISSION: S492331 BEAN SHEET Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REREGISTRATION ACTION: 629 GENERAL CORRESPONDENCE
CHEMICALS: 108801 Metolachlor (ANSI) 100.00 %

ID#: 108801
COMPANY:
PRODUCT MANAGER: 71 WALTER WALDROP 703-308-8062 ROOM: CS1 2C3
PM TEAM REVIEWER: JANE MITCHELL 703-308-8061 ROOM: CS1 3C6
RECEIVED DATE: 07/25/95 DUE OUT DATE: 10/23/95

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 222989 EXPEDITE: N DATE SENT: 02/14/96 DATE RET.: / /
CHEMICAL: 108801 Metolachlor (ANSI)
DP TYPE: 001 Submission Related Data Package
CSF: LABEL:

ASSIGNED TO	DATE IN	DATE OUT	
DIV : EFED	02/15/96	/ /	ADMIN DUE DATE: / /
BRAN: EFGB	02/22/96	/ /	NEGOT DATE: / /
SECT: GTS	02/22/96	03/08/96	PROJ DATE: / /
REVR : KCOSTELL	02/22/96	03/04/96	
CONTR:	/ /	/ /	

* * * DATA REVIEW INSTRUCTIONS * * *

Review comments relating to ground water/Metolachlor Draft RED.

* * * DATA PACKAGE EVALUATION * * *

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
218524	RSCB	08/21/95	11/04/95	Y	N	N
218525	OREB	08/21/95	11/04/95	Y	N	N
218526	TB-2	08/21/95	11/04/95	Y	N	N
218527	EEB/RS4	08/21/95	11/04/95	Y	N	N
218528	EFGB/CRS1	08/21/95	11/04/95	Y	N	N
222991	EFGB/SWS	02/14/96	/ /	Y		

1. CHEMICAL:

Chemical name: 2-Chloro-N-(2-ethyl-6-methylphenyl)-N-(2-methoxy-1-methylethyl)acetamide

Common name: Metolachlor
Trade names: Dual and Medal
Structure:

2. TEST MATERIAL:

Metolachlor

3. STUDY/ACTION TYPE

Review of CIBA's comments on Draft RED for metolachlor

4. STUDY IDENTIFICATION:

Title: Metolachlor Registration Eligibility Decision Document-Submission of CIBA Crop Protection Comments

By: Karen Stone
CIBA Crop Protection

Identifying No.: 108801
DP Barcode: D222989
Date Sent to EFED: 2/15/96

5. REVIEWED BY:

Kevin Costello, Geologist
OPP/EFED/EFGWB/Ground-Water Technology Section
Signature: Kevin J Costello
Date: 3/11/96

6. APPROVED BY:

Elizabeth Behl, Section Chief
OPP/EFED/EFGWB/Ground-Water Section
Signature: EBehl
Date: 3/8/96

7. **CONCLUSIONS**:

In its comments on the draft Reregistration Eligibility Document (RED) for metolachlor, CIBA recommends minor changes to contents pertaining to metolachlor and ground water. For instance, CIBA points out that one of the states in which there have been detections was Missouri, not Montana. CIBA claimed that the ground-water detections in Missouri were likely due to point-source contamination, since the "well was also contaminated with two other herbicides above their MCLs. However, the Missouri detections referred to in the RED were from U.S. Geological Survery Open File Report 88-495, in which the authors conclude that the suspected source of contamination was normal field use.

In addition, they note that while the RED mentioned that CIBA was analyzing for metolachlor in the 19-state atrazine ground-water study, it did not mention that metolachlor was also an analyte in the 7-state simazine program. The data from both of these programs will be helpful in better characterizing the environmental fate of metolachlor, as will the two prospective ground-water monitoring studies currently underway.

CIBA would also like to change the language of the ground-water advisory which was recommended for the metlochlor label. CIBA proposed the following advisory, which reflects the changes shown here in bold:

> "This chemical is known to leach through soil into ground water under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in **detectable levels** in ground water."

The standard label reads, ". . .may result in ground-water contamination."

The Ground Water Section of EFGWB does not consider the differences between CIBA's proposed ground-water label advisory and the standard EFGWB language for the advisory significant enough to warrant any change in the wording of the standard advisory. In addition to wishing to keep the label consistent with standard language, EFGWB is also uncomfortable adding any descriptors that imply what level of ground-water contamination might occur with the use of metolachlor. In particular, the term "detectable levels" is vague, since different methods of detection (LC/MS, ELISA) have different minimum detection levels. The purpose of a label advisory is simply to inform the public that the chemical can leach as a result of normal agricultural use.